

***SAN LUIS VALLEY IRRIGATION DISTRICT***  
***296 Miles Street/P.O. Box 637***  
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SENT ONLY BY E-MAIL  
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Dan Dallas, Forest Supervisor  
Rio Grande National Forest  
1803 W. Highway 160  
Monte Vista, Colorado 81144

Re: San Luis Valley Irrigation District – Letter of Support for Alternative B to Forest  
Plan Revision

Supervision Dallas:

The San Luis Valley Irrigation District (“District”) appreciates this opportunity to state its support for Alternative B to the Draft Forest Plan Revision for the Rio Grande National Forest. The District is an Irrigation District formed under the Irrigation District Act of 1905, Colo. Rev. Stat. §§ 37-41-101, *et. seq.*, as amended. It operates the Farmers Union Canal which diverts water from the Rio Grande River and delivers it through a network of over 100 miles of ditches to nearly 62,000 acres of land in Alamosa, Rio Grande and Saguache Counties. It also owns and operates Rio Grande Reservoir located in the Rio Grande National Forest on the headwaters of the Rio Grande in Hinsdale County, about 20 miles southwest of Creede, Colorado. It is the only on-stream mainstem reservoir on the Rio Grande in Colorado. And, it is a “pre-Compact” reservoir under the Rio Grande Compact, all of which make the Reservoir vital to the San Luis Valley and the Rio Grande Basin in Colorado. The Reservoir’s current storage capacity is approximately 54,000 acre-feet. While the majority of the water stored in the Reservoir is for the irrigation of the District’s land, water is also stored for a variety of other uses. Under the Rio Grande Cooperative Project, the delivery of some water stored in the Reservoir, is reregulated allowing it to meet in-stream riparian, environmental, and recreational needs in and along the Rio Grande as it runs through the National Forest to its ultimate place of use.

The District has participated in the Forest Plan Revision process, and has shared its views on a multitude of issues as the various alternatives have been developed. We are pleased to see that the overall plan and the implementation of the proposed adaptive management process, particularly under Alternative B, considers and addresses many of the issues and concerns discussed in public meetings and through public comment from a wide variety of interests. In our

view, Alternative B of the Draft Plan provides a working document with reasonable and understandable implementation and forest management practices. Of course, our primary concern is the protection of the Rio Grande watershed so that the River continues to meet the irrigation needs in the San Luis Valley and the State of Colorado's obligations under the Rio Grande Compact. Additionally, proper management of the flow of water and the delivery and reregulation of the delivery of water for a variety of purposes and uses, helps assure River health and are of great benefit to the Rio Grande National Forest.

As noted above the District supports Alternative B of the Draft Forest Plan Revisions, with a few concerns. Several organizations, including RWEACT, have provided detailed statements of support, with which the District agrees and will not repeat here. Therefore, we will focus on our few concerns which are as follows:

1. Wilderness. The District is concerned about the proposed designation of additional wilderness areas under Alternative B and, in this instance, believes that Alternative C, which does not include any wilderness area recommendations, should be incorporated into Alternative B as part of the preferred alternative. The District operates Rio Grande Reservoir which is located in the Rio Grande National Forest and is immediately adjacent to the Weminuche Wilderness Area. The District's need to operate, maintain, and improve the Reservoir, and the Forest Service's needs regarding access to and use of the Wilderness Area, have only recently been resolved after years of negotiation. Moreover, water is delivered to Rio Grande Reservoir from several ditches located within the Wilderness Area. Addressing operational and maintenance needs for these facilities is significantly constrained, if not prohibited, because they are within the Weminuche Wilderness Area. Adding wilderness will severely limit the operation of other water delivery facilities which have been located in these areas for decades. As the Forest Service is well aware, designation of new wilderness will impact the operation of existing water delivery facilities and of developing new facilities that are essential to (a) meet increasing water needs within the Rio Grande Basin, (b) the economy of the San Luis Valley, and (c) the State of Colorado's demand for water to address the inevitable population increase and need for economic growth in the region. We believe that through the adaptive management process, many of the wilderness values identified in the Draft Plan can be protected through cooperation and collaboration while allowing for continued use and improvement of water delivery facilities in these areas.

Additionally, there are numerous facilities in these areas which provide essential data and forecasting tools that facilitate a better understanding of the hydrology in the Rio Grande Basin, including changes in the climate and the impacts on water supply. Including these facilities in new wilderness areas will encumber the ability to use and maintain them and will, as a result, decrease their usefulness in understanding and managing the Basin's limited water resources. This will, we believe, impact the use of water to meet many of the values the Forest Service has identified for protection in the Draft Plan.

2. Wild and Scenic River Recommendations. Alternatives B, C, and D of the Draft Plan recommend 12 stream segments for continued eligibility for wild, scenic, or recreational designation and six segments to remain “suitable” under the Wild and Scenic River Act. It is our understanding that for several years the Forest Service has been managing at least the 12 “eligible” segments as wild, scenic, or recreational without an actual designation. This management policy, in our view, is consistent with the proposed adaptive management process that allows for a flexible management approach which addresses changing needs and demands within the Rio Grande National Forest. Therefore, the District believes that it is appropriate and preferable to withdraw consideration of these river or creek segments for inclusion under the Wild and Scenic River Act. At the very least, any continued evaluation of these stream segments must include recognition that these segments are subject to the terms and conditions of the reserved water rights decreed in Water Division No. 3 for the Rio Grande National Forest in Case No. 88CW183. Any attempt to claim additional reserved water rights would subject the entire decree, which took years to negotiate, to reconsideration and, most likely, years of additional negotiation and, potentially litigation.

The District does not oppose the addition of Deadman Creek under the Wild and Scenic River Act in light of its relationship to the Sand Dunes National Park.

The District appreciates the opportunity to comment on the Draft Forest Plan Revision and to participate in the development of the proposal. We commend the Forest Service for the openness of the planning process and for its close coordination and cooperation with the public. We look forward to continuing to work with the Forest Service through its adaptive management process. Please contact the District if you have any additional question or would like to discuss our comments further.

Sincerely yours,

/s/ Randall Palmgren

*(original signature on file at District's Office)*

Randall Palmgren, President  
San Luis Valley Irrigation District  
Board of Directors

cc: (sent by e-mail)  
Board of Directors  
Tod Smith